CHILDREN'S ENVIRONMENTAL HEALTH & PROTECTION ADVISORY COUNCIL

May 1, 2019

RF Safety Program
Federal Communications Commission
Office of Engineering and Technology
445 12th Street, SW
Washington, DC 20554
rfsafety@fcc.gov

Re: **Requesting update of the FCC's evaluation of the effect of emissions on the quality of the human environment – specifically the impact to children and their environment**

Dear Sir or Madam,

The Maryland Children's Environmental Health and Protection Advisory Council (CEHPAC) requests that the U.S. Federal Communications Commission (FCC) re-evaluate its guidelines[1,2] related to the impact of Radiofrequency Electromagnetic Field (RFEM) exposure on human health. Specifically, we are concerned about the health effects of children's exposure to RFEM exposures, and we ask if the FCC included such impacts to children and pregnant women when determining the current policy. Other questions we have include whether current policy ensures that newer devices do not expose children to unsafe levels of radiation – especially when used in a classroom setting – and whether the FCC provides guidance for using such devices in schools.

To protect children from environmental hazards, it is necessary to consider the special vulnerability of children due to their developing physiology, and their exposures, behaviors, and diets, which can differ greatly from those of adults. The current FCC guidance on RFEM is decades old and we are calling for it to be updated to reflect current science on thermal and non-thermal health effects and newer (or emerging) exposures, especially to children. Since 1999, when the FCC published "Questions and Answers about Biological Effects and Potential Hazards of Radiofrequency (RF) Electromagnetic Fields,"[3] there has been expanded use of RFEM technology and documentation has emerged to show that such exposure is (potentially) causing significant risks to human health.

CEHPAC relies on the FCC to provide up-to-date information and to answer some of the most commonly asked questions related to this topic. We address this letter to you as we understand that any questions on the Commission's policies with respect to radio frequency electromagnetic fields should be addressed to the RF Safety Program. We understand that the National Environmental Policy

[1] 47 CFR § 1.1310 - Radiofrequency radiation exposure limits.
[2] U.S. Federal Communications Commission, 1997. "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields. OET Bulletin 65, Ed. 97-01. Washington, DC. Accessed 3/27/19 at: https://transition.fcc.gov/bureaus/oet/info/documents/bulletins/oet65/oet65.pdf.
[3] U.S. Federal Communications Commission, 1999. "Questions and Answers about Biological Effects and Potential Hazards of Radiofrequency (RF) Electromagnetic Fields." OET Bulletin 56, Fourth Edition. Washington, DC. Accessed 3/27/19 at: https://transition.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet56/oet56e4.pdf.

Act of 1969 requires the FCC to evaluate the effect of emissions from FCC-regulated transmitters on the quality of the human environment.[4] We also understand that currently there is no federally mandated radio frequency (RF) exposure standard.

As defined in statute (Md. Code Ann., Health-General §§ 13-1501 thru 1506), CEHPAC seeks to ensure that the rules, regulations, and standards adequately protect the health of children from environmental hazards. CEHPAC's goal is to enable children in Maryland to grow up in a safe and healthy environment. Our duties include:

- ✓ Provide input to the General Assembly on legislation that may impact environmental hazards that affect the health of children;
- ✓ Recommend uniform guidelines for State agencies to follow to help reduce and eliminate children's exposure to environmental hazards; and
- ✓ Educate others regarding the environmental hazards that impact children's health, the means to avoid those hazards and provide any other relevant information that will assist in protecting children health. [5]

The opinions of CEHPAC expressed in this letter do not necessarily reflect that of the Maryland Department of Health or any other State agency. CEHPAC looks forward to working with the FCC as well as the Governor and the General Assembly of Maryland on this issue, and thanks FCC for its leadership and support in identifying potential public health impacts of Radiofrequency Electromagnetic Field exposure.

For CEHPAC,

Megan Weil Latshaw PhD, MHS

Cc: Robert R. Neall, Secretary, Maryland Department of Health
Benjamin Grumbles, Secretary, Maryland Department of the Environment

[4] 47 CFR § 1.1307 - Actions that may have a significant environmental effect, for which Environmental Assessments (EAs) must be prepared

[5] See, for example, "Children and Electromagnetic Radiation in Schools," at: https://phpa.health.maryland.gov/OEHFP/EH/Pages/WiFiCEHPAC.aspx.